



Ms. Marlene H. Dortch, Commission Secretary Office of the Secretary Federal Communications Commission 445 12th Street SW, Suite TW-A325 Washington, DC 20554

RE: EB Docket No. 06-36

CPNI Certification Filing for Clear Voice, LLC - Calendar Year 2012

Dear Ms. Dortch:

In accordance with Federal Communications Commission's EB Docket No. 06-36, and pursuant to 47 C.F.R. § 64.2009(e), Clear Voice, LLC files its Certification and supporting Statement of Customer Proprietary Network information (CPNI) for the year 2012. Please include this Certification in EB Docket No. 06-36.

Please contact me at 407-740-3001 or tforte@tminc.com if you have any questions about this filing.

Thank you for your assistance with this matter.

Sincerely,

/s/Thomas M. Forte

Thomas M. Forte Consultant to Clear Voice, LLC

**Enclosure** 

cc: I. Rozenberg - Clear Voice (via e-mail)

file: Clear Voice - FCC CPNI

tms: FCx1301

## ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

## EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2013:

Covering calendar year 2012

Name of company(s) covered by this certification:

Clear Voice, LLC

Form 499 Filer ID:

827038

Name of signatory:

Israel Rozenberg

Title of signatory:

Vice - President

- I, Israel Rozenberg, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 et seq.
- 2. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in §64,2001 et seq. of the Commission's rules.
- 3. The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
- The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
- 5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Israel Rozenberg Vice - President

Date

Attachments:

Accompanying Statement explaining CPNI procedures

Attachment A
Statement of CPNI Procedures and Compliance

## CLEAR VOICE, LLC STATEMENT OF CPNI PROCEDURES AND COMPLIANCE

Clear Voice, LLC ("Clear Voice") operates solely as a cellular resale provider.

Clear Voice does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Clear Voice has trained its personnel not to use CPNI for marketing purposes. Should Clear Voice elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

Clear Voice has instituted training procedures and a corresponding disciplinary process to ensure that its personnel understand ad comply with restrictions regarding the use and disclosure of, and access to, CPNI. Requests for CPNI by law enforcement agencies are only granted if a subpoena is provided or if the customer provides written permission.

New clients are provided with the opportunity to create a 4 digit PIN code at the time of subscription for service. These customers must utilize the PIN number whenever they contact the company for CPNI related issues. Customers that do not opt for the PIN system must provide at least three (3) identifying pieces of information to ensure the company is discussing the account with an authorized individual.

Although Clear Voice never has had an instance where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI, it still has procedures in place to track these instances, and notify the appropriate agencies, should they occur. Clear Voice has processes in place to safeguard the call detail information from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to these records. All call detail is stored in a database that is protected; only authorized Clear Voice personnel have access to the database. It is not accessible by anyone outside the company.

## CLEAR VOICE, LLC STATEMENT OF CPNI PROCEDURES AND COMPLIANCE (CONTINUED)

The Company does not disclose CPNI on-line. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information and customer notification of account changes.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI, but does take steps to protect CPNI from pretexters as described in this statement.

The Company has not taken any actions against data brokers in the last year. Clear Voice has processes in place to safeguard the call detail information from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to these records. All call detail is stored in a database that is protected; only authorized Clear Voice personnel have access to the database. It is not accessible by anyone outside the company.

The Company did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2012.